## REMARKS

Claims 1-51 are pending. Claims 45-47 have been canceled without prejudice to or disclaimer of the subject matter of the claims. Claims 6, 12, 13, 21, 32 and 43 have been amended for clarity. New claims 49-51 have been added, support for which can be found throughout the specification, including, among other places, paragraphs [0025]-[0029] and FIGS. 2, 3 and 4A-4B. Applicants respectfully request reconsideration of the application in response to the non-final Office Action.

Claim Rejections – 35 U.S.C. §103(a)

Claims 1-12 and 45-47

Claims 1-12 and 45-47 have been rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over U.S. Patent No. 5,872,917 to Hellman ("Hellman") in view of U.S. Patent No. 7,155,607 to Yokota et al. ("Yokota"). Applicants traverse the rejection.

Hellman illustrates in FIG. 1 (reproduced below) a data flow between user and host computers 10 and 12, respectively.

FIG. 1 (Hellman)
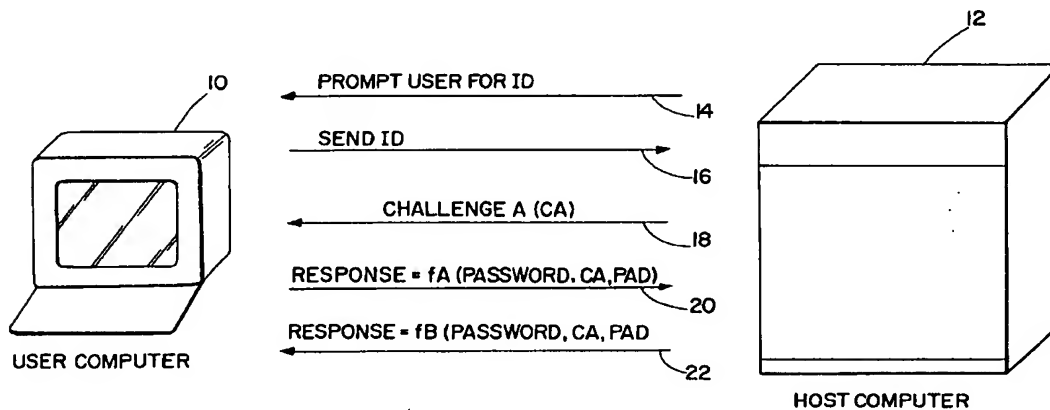
DATA FLOW BETWEEN USER AND HOST COMPUTER

Hellman's technique is different from the method for authenticating a computer, recited in independent claim 1, which includes the following steps:

> issuing a credential from a first computer to a second computer;

> transmitting said credential and a computer challenge from the second computer to the first computer when the second computer is to be authenticated;

> transmitting a response to said computer challenge from said first computer to said second computer; and

> verifying said response with said second computer in order to authenticate and verify said computers.

For example, as described in the specification of the instant application in reference to FIG. 3 (Specification at paragraph [0025]), a server computer 14 generates a credential (cred) for a client computer 12 in step 310 that proves the identity of the client computer 12. For the embodiment shown in FIG. 3, the credential (cred) is generated using a long term server key (ks) and a seed (s), a maximum number of times (m) to run a hash function, an expiration time (exp), a time interval (t3), and username (user/domain) information to uniquely determine the client computer 12.

Additionally, as further described in the specification of the instant application in reference to FIG. 2 (Specification at paragraph [0026]), the credential received by the client computer 12 in step 202 can be used to re-establish a seamless connection with the server computer 14 in the event that a connection between the server computer 14 and the client computer 12 is terminated at step 204. In order to reconnect, the client computer 12 transmits the credential it received from the server computer 14 in step 202 to the server computer 14 in step 206. Then, in step 208, the process of authenticating the client computer 12 and the server computer 14 with

the credential issued from step 202 is performed. Once the authentication is complete, the connection is reestablished in step 210.

Applicants respectfully disagree with the Office's suggestion on pages 2-3 of the Office action that Hellman discloses issuing a credential from a first computer to a second computer, and the second computer transmitting the credential and a computer challenge to the first computer. In particular, the Office likens the password described in Hellman to the credential issued by the first computer in claim 1, but Hellman describes that the authenticating party and/or the party to be authenticated prove that they know a shared password without actually revealing the password during the exchange of data in an authentication sequence. (Hellman at col. 3, lines 30-38, emphasis added). That is, in Hellman, the user is assigned a password known by the host computer prior to any communications. (Hellman at col. 6, lines 5-7, emphasis added).

Accordingly, even if, *arguendo*, the password in Hellman could be likened to a credential, Hellman teaches away from the steps of issuing a credential from a first computer to a second computer and transmitting said credential and a computer challenge from the second computer to the first computer, as recited in claim 1. Moreover, in FIG. 1, Hellman shows transmitting a challenge 18 from the host 12 to the user 10 but does not show "transmitting said credential and a computer challenge from the second computer to the first computer," as recited in claim 1.

Thus, Applicants submit *prima facie* obviousness cannot be established because Hellman does not teach or suggest all of the claim limitations of independent claim 1 and Yokota does not supply, and is not purported to supply, the teachings missing from Hellman. (See, MPEP § 2143.03, citing *In re Royka*, 490

F.2d 981, 180 USPQ 580 (CCPA 1974)). Accordingly, Applicants respectfully request that the rejection under 35 U.S.C. § 103(a) of independent claim 1, and claims 2-6, which depend therefrom, be withdrawn. Similarly, for reasons analogous to those presented for claim 1, Applicants respectfully request that the rejection under 35 U.S.C. § 103(a) of independent claim 7, and claims 8-12, which depend therefrom, be withdrawn. Claims 45-47 have been canceled, thereby rendering the rejection of claims 45-47 under 35 U.S.C. § 103(a) moot.

Moreover, Applicants submit that, for at least the same reasons presented with respect to claim 1, new independent claim 49, and claims 50 and 51, which depend therefrom, are also patentable over the combination of Hellman and Yokota. At a minimum, the combination of Hellman and Yokota does not teach or suggest the steps of "issuing a credential from a first computer to a second computer" and "in response to a connection between the first computer and the second computer being terminated, transmitting said credential and a computer challenge from the second computer to the first computer when the second computer is to be authenticated," as recited in claim 49.

Claims 13-44 and 48

Claims 13-44 and 48 have been rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Hellman in view of Yokota and further in view of U.S. Patent No. 6,535,980 to Kumar et al. ("Kumar"). Applicants traverse the rejection.

For at least the same reasons presented for claim 1, Applicants submit that independent claims 13, 24, 35 and 48 are also patentable over the combination of

Hellman and Yokota, and that Kumar does not supply, and is not purported to supply, the teachings missing from Hellman and Yokota.

At a minimum, the combination of Hellman, Yokota and Kumar does not teach or suggest: the steps of "issuing a credential from a first computer to a second computer," "generating with the second computer a first challenge," "transmitting the credential and the first challenge from the second computer to the first computer," as recited in independent claim 13; or to execute a procedure including "issue a credential from a first computer to a second computer," "generate a first challenge with the second computer," and "transmit the credential and the first challenge from the second computer to the first computer," as recited in independent claim 24; or first and second computers configured to "issue a credential from the first computer to the second computer," " generate a first challenge with the second computer," and "transmit the credential and the first challenge from the second computer to the first computer," as recited in independent claim 35; or the steps of "issuing a credential from the first user to the second user," "generating a first challenge with the second user," and "transmitting the credential and the first challenge to the first user," as recited in independent claim 48.

Accordingly, Applicants respectfully request that the rejection under 35 U.S.C. § 103(a) of independent claim 13, and claims 14-23, which depend therefrom; of independent claim 24, and claims 25-34, which depend therefrom; of independent claim 35, and claims 36-44, which depend therefrom; and of independent claim 48 be withdrawn.

Conclusion

It is believed that this Amendment does not require additional fees. However, if additional fees are required for any reason, please charge Deposit Account No. 02-4800 the necessary amount.
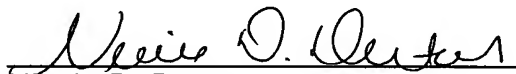
In the event that there are any questions concerning this paper, or the application in general, the Examiner is respectfully urged to telephone Applicants' undersigned representative so that prosecution of the application may be expedited.

Respectfully submitted,

BUCHANAN INGERSOLL & ROONEY PC

Date: <u>September 25, 2007</u>   By: _____

Nicole D. Dretar
Registration No. 54,076

P.O. Box 1404
Alexandria, VA 22313-1404
703 836 6620